

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

POST OFFICE STRUCTURE PLAN

DOCKET NO. N2012-2

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE [DBP/USPS-15 THROUGH 25]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

June 20, 2012

Respectfully submitted,

N20122D15

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-15                      Please refer to your response to Interrogatory DBP/USPS-1.

[a]     Please confirm, or explain, that Library Reference USPS-LR-N2012-2/1 contains all of the post offices being considered in this Docket.

[b]     Please advise the approximate percentage of the total number of post offices that this represents.

[c]     Please confirm, or explain, that Library Reference USPS-LR-N2012-2/2 collectively contains all of the post offices in the country.

DBP/USPS-16                      Please refer to your response to Interrogatory DBP/USPS-2.  
If a customer has a complaint regarding the service being conducted at an RMPO or PTPO, how will they know the location of the responsible Postmaster at the APO?

DBP/USPS-17                      Please refer to your response to Interrogatory DBP/USPS-4.

Please provide any insight, if there is any, that an individual responding to the survey and who fully understood the survey responses could have a rational reason as to why it would be a better choice to have an office close and provide no service in any given area then it would be to maintain some level of service in that area.

DBP/USPS-18                      Please refer to your response to Interrogatory DBP/USPS-6.

I realize that larger offices – Level 18 and above – are not covered in this proceeding. However, if similar activity as being proposed in this Docket has already been conducted in these larger offices, I would like to pursue the experience that was learned in that activity. Please respond to the original Interrogatory.

DBP/USPS-19                      Please refer to your response to Interrogatory DBP/USPS-8.  
Your response does not seem logical. If an office is now open for the better part of the business day and a collection is made towards the end of that time, if that office is now open for fewer hours during the day and those hours are made earlier in the day, who will make the collection of the blue collection box?

DBP/USPS-20                      Please refer to your response to Interrogatory DBP/USPS-9  
subpart [a].  
Your response does not seem logical. If an office is now open for the better part of the business day and a dispatch is made towards the end of that time, if that office is now open for fewer hours during the day and those hours are made earlier in the day, who will make the dispatch of the mail?

DBP/USPS-21                      Please refer to your response to Interrogatory DBP/USPS-9  
subpart [b].  
Your response does not seem logical. If an office is now open for the better part of the business day and a dispatch is made towards the end of that time, if that office is now open for fewer hours during the day and those hours are made earlier in the day, who will make the dispatch of the mail that the carrier collected along their route?

DBP/USPS-22                      Please refer to your response to Interrogatory DBP/USPS-10.

[a]     Please confirm or explain that some of the offices being covered by this Docket provide access to post office boxes only at times when there is an employee on duty.

[b]     If so, how will these customers have the same access to their post office boxes if the hours of service are reduced?

DBP/USPS-23                      Please refer to your response to Interrogatory DBP/USPS-11  
Please advise the options that customers may receive accountable or oversized mail that do not involve pick-up at a Post Office retail window.

DBP/USPS-24                      Please refer to your response to Interrogatory DBP/USPS-13.

If an affected office reduces its hours and they are made in the late afternoon, who will be available at the office to sort the mail for the carriers to deliver?

DBP/USPS-25

[a]     How will this Docket affect the box up time for post office box mail?

[b]     If the activity level during the reduced window hours is now increased, what effect will that have on the box up time?